

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, *et al.*, *ex*
rel. JULIANNE NUNNELLY and
MATTHEW SHANKS

Plaintiffs,

v.

REGENERON PHARMACEUTICALS,
INC.,

Defendants.

1:20-cv-11401-PBS

**REGENERON’S MOTION TO CONTINUE THE SEALING OF PROVISIONALLY
SEALED CONFIDENTIAL INFORMATION**

Defendant Regeneron Pharmaceuticals, Inc. (“Regeneron”) respectfully requests that this Court enter a sealing order that both maintains the current redactions of confidential information in the publicly-filed version of the Complaint in Intervention (“Complaint”) and directs that certain previously provisionally sealed exhibits be made publicly available only in redacted fashion.¹ We ask that these redactions be maintained on the filed documents unless and until otherwise ordered by the Court. As set forth in the Declaration of Rena K. Goins and Regeneron’s Memorandum in support of this Motion, which are incorporated herein by reference, the information sought to be redacted is highly confidential and contains information that, if disclosed, would lead Regeneron to suffer severe economic harm. To avoid this result, as well as to safeguard the confidentiality interests of third parties, Regeneron respectfully asks that the Court grant this Motion.

¹ See Exs. 1–24, 34, 36, 38, 40, 42–45, 48–51.

LOCAL RULE 7.1(a)(2) CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), undersigned counsel hereby certifies that counsel for Regeneron conferred with counsel for the United States and attempted in good faith to resolve or narrow the issues presented in this motion, and the United State informed undersigned counsel that they oppose this motion.

Dated: April 18, 2024

Respectfully submitted,

/s/ Gregory F. Noonan
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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2024, a true and correct copy of the foregoing motion was served via ECF on all counsel of record.

/s/ Gregory F. Noonan
Gregory F. Noonan